

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

INNOVATIO IP VENTURES, LLC,)
)
Plaintiff,) Consolidated Case No. 11 C 9308 (MDL 2303)
)
) Individual Case No. 1:11-cv-6478
)
) Honorable James F. Holderman
JW MARRIOTT CHICAGO, et al.)
)
) **JURY TRIAL DEMANDED**
Defendants.)

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO ANSWER OR OTHERWISE PLEAD**

The following Defendants:

Chicago Marriott Midway
Courtyard Chicago Downtown/Magnificent Mile
Courtyard Chicago Midway Airport
Courtyard Chicago Schaumburg
Fairfield Inn & Suites Chicago Midway
Residence Inn Chicago Downtown/River North
Residence Inn Chicago Lake Forest/Mettawa
Residence Inn Chicago Midway Airport
Residence Inn Chicago Naperville/Warrenville
Residence Inn Chicago Oak Brook
Residence Inn Chicago Schaumburg
Springhill Suites Chicago Downtown/River North
Springhill Suites Chicago Schaumburg

(collectively, "Identified Defendants") by their undersigned attorneys and by agreement with counsel for Plaintiff, Innovatio IP Ventures, LLC, respectfully move the Court pursuant to the Federal Rules of Civil Procedure for an extension of ten (10) days, to March 12, 2012 of the deadline for each of the Identified Defendants to answer or otherwise respond to the First Amended Complaint.

In support hereof, the Identified Defendants rely upon all matters of record to date and further state:

1. This is an action for alleged patent infringement of seventeen (17) patents pursuant to 15 U.S.C. § 1125(a).
2. Plaintiff filed its Complaint on September 15, 2011. Plaintiff filed a First Amended Complaint on February 17, 2012. The Identified Defendants' respective responsive pleadings are currently due on March 5, 2012.
3. Plaintiff and the Identified Defendants are engaged in settlement discussions which should be concluded within the next ten (10) days.
4. The undersigned counsel has confirmed with counsel of record for Plaintiff that Plaintiff agrees to the requested extension of time.
5. This request is made in the interests of justice and not for the purposes of delay.

WHEREFORE, without waiver of any claims or defenses they may respectively have, the Identified Defendants respectfully request that this Court grant each of the Identified Defendants an extension of time to answer or otherwise respond to the First Amended Complaint in this cause, to and including March 15, 2012.

Dated: March 2, 2012

Respectfully submitted,

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ORDER

The Court, having reviewed the Defendants' Unopposed Motion For Extension Of Time
Within Which To Answer Or Otherwise Plead, now grants same.

The following Defendants:

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shall have until March 15, 2012 to answer or otherwise respond to the Amended Complaint.

ENTERED:

Honorable James F. Holderman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 2, 2012 the foregoing

***Defendants' Unopposed Motion For Extension Of Time Within Which To Answer Or
Otherwise Plead***

was filed with the Clerk of the Court using its CM/ECF system, which will send notification of such filing to all attorneys of record in which will then send a notification of such filing to all counsel of record in Consolidated Case No. 11 C 9308 (MDL 2303) in accordance with Local Rule 5.9.

The following counsel of record have appeared in Individual Case No. 11 C 6478:

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s/Richard M. Davis
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